

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

ALBIN MELI,)	
CHARLIE MELI, and)	
JEREMIE MELI,)	
Plaintiffs,)	
)	
v.)	Civil Action No. 2:19–CV–71
)	
CITY OF BURLINGTON, VERMONT)	
)	
BRANDON DEL POZO,)	
INDIVIDUALLY AND IN HIS)	
OFFICIAL CAPACITY AS CHIEF)	
OF POLICE FOR THE CITY OF)	
BURLINGTON, VERMONT)	
)	
JASON BELLAVANCE,)	
INDIVIDUALLY AND IN HIS)	
OFFICIAL CAPACITY AS A POLICE)	
OFFICER FOR THE CITY OF)	
BURLINGTON, VERMONT)	
)	
CORY CAMPBELL)	
INDIVIDUALLY AND IN HIS)	
OFFICIAL CAPACITY AS A POLICE)	
OFFICER FOR THE CITY OF)	
BURLINGTON, VERMONT,)	
)	
Defendants.)	

STIPULATED ROLLING PRODUCTION SCHEDULE

NOW COME the parties, by and through their respective counsel, and, pursuant to F.R.C.P. 34(b)(2)(B), hereby agrees to the following rolling production scheduled:

- By December 2, 2019, the parties will agree to all search terms that the City of Burlington and the Burlington Police Department will use to search their records for relevant ESI. If the parties are unable to reach an agreement on the search terms, then

they shall file a motion with the Court requesting a discovery conference to resolve the search terms.

- By December 2, 2019, Defendants will produce their first round of documents, which shall include the internal investigation. This first round of documents will not include documents pulled from the search terms agreed upon by the parties.
- By January 15, 2019, Defendants will produce their second round of documents, which will include documents pulled pursuant to the agreed upon search terms.
- By February 15, 2019, Defendants will produce their third round of documents, which will include documents pulled pursuant to the agreed upon search terms.
- By March 1, 2019, Defendants will complete their production of documents.

DATED at Burlington, Vermont, this 25th day of November, 2019.

CITY OF BURLINGTON, POLICE CHIEF
BRANDON DEL POZO, POLICE
OFFICER JASON BELLAVANCE, AND
POLICE OFFICER CORY CAMPBELL

By: /s/ Pietro J. Lynn
Pietro J. Lynn, Esq.
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DATED at Burlington, Vermont, this 25th day of November, 2019.

ALBIN MELI, CHARLIE MELI, and
JEREMIE MELI,

By: *S/Evan Chadwick*

Evan Chadwick, Esq.
Chadwick & Spensley, PLLC
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SO ORDERED.

Hon. William K. Sessions III